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Environmental Protection Agency  
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OREGON OPERATIONS OFFICE

AUG 23 2016

EPA-REGION 10

Recent studies have shown how parts of the Willamette River that were designated as a Superfund site by the EPA in 2000 are recovering due to natural processes. This is why it makes no sense to spend \$1 billion to dredge this part of the river and disturb the existing contaminants. Stirring up the pollutants in this manner will only make things worse in the river. If the record shows that the river is actually healing itself over time, it should be allowed to continue healing itself without interference from the EPA.

The main question might be how long will the natural processes take for the river to heal itself, but we should allow it to transpire whether it takes ten years or a hundred years. Essentially, if there is evidence that Portland Harbor is recuperating on its own, we should discourage the EPA's proposal to dredge this area because there is no proof that this invasive method will work. It may appear initially that the dredging is working, but later on those contaminants may make their way further down the river to contaminate a whole other area.

Ultimately, this situation is no different than what happens with gas tanks that old gas stations have abandoned. If it can be proven that they're not leaking, why dig them up? Leave them alone! Eventually, they are going to erode away and become part of the soil. It may take a hundred years, but there is no reason to mess with them; just leave them be. Unfortunately, the EPA dictates that they have to be dug up in order to re-develop the property, which doesn't make any sense. They're not hurting anything. The containers are only metal, which will, over time, become part of the soil. The same could be said for the Willamette River: the EPA should leave the river alone and let it take care of itself.

Sincerely,

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